



October 18, 2007

Joe Yun
Department of Water Resources
Division of Planning and Local Assistance
P.O. Box 942836
Sacramento, CA 94236-0001
Via email: jyun@water.ca.gov

RE: Proposition 84 IRWM Guideline Development

Dear Mr. Yun,

On behalf of TreePeople, I am writing in response to your solicitation of comments regarding the development of Proposition 84 Integrated Regional Water Management (IRWM) grant guidelines.

Background – TreePeople and Watershed Management

TreePeople is an award-winning non-profit organization serving the Los Angeles region for more than thirty years. We promote and engage thousands of local residents in building the Los Angeles urban forest, inspiring individuals, schools, business and government to work together to create sustainable solutions to issues affecting our urban ecosystem. One major area of focus for TreePeople is working with government agencies on critical water issues. Both regionally and nationally, TreePeople is helping to promote watershed best management practices.

We actively support community-wide integration of management and resources related to our regional watersheds, including water supply and stormwater management for the Los Angeles region. A properly designed and maintained urban forest can provide an invaluable resource in capturing, cleaning and storing rainwater – both increasing supply while decreasing polluted runoff. Projects and programs such as city-wide networks of cisterns, strategic neighborhood landscaping, and watershed-scale planning and retrofits are several ways to capture and manage rainwater for multiple objectives.

The IRWM program supports watershed-scale integrated management, including stormwater capture and reuse. IRWM can help complement and support both TreePeople and our local agency partners in meeting our goals through providing planning and project funding for important local water supply, stormwater and groundwater clean up projects. As such, we would like to ensure that the IRWM program and local IRWM plans are consistent with our urban watershed objectives in promoting integrated programs and projects in our region.

Comments – Proposition 84 IRWM Grant Guidelines

The following are some specific suggestions for your consideration as you begin to develop the Proposition 84 IRWM Guidelines:

- It is acceptable to defer to a region's preferred project list if established targets are required for IRWM plans and the prioritization of IRWM projects.
- The largest functional unit possible should form a region, understanding that some sub-regions within those regions may have issues that do not involve all parties and may require some additional planning of their own. We welcome DWR's efforts within regions to help facilitate consensus building regarding the organization of planning groups.
- The quality and content of the IRWM plans should be improved through the establishment of targets with measurable objectives with a priority for integrated projects that meet multiple objectives.
- We believe that statewide priorities are a valuable element of the IRWM program, and that IRWM plans and projects should contribute to the attainment of statewide objectives.
- In addition to the requirements for consistency with state resource plans, IRWM plans should also be required to be consistent with local and regional resource plans.
- In order to be the most effective, climate change should be an overarching objective for the IRWM program as well as embedded in the individual standards. It should be addressed from both angles: 1) to reduce contributions to greenhouse gases and, 2) to facilitate adaptation from uncertainties.

Thank you for this opportunity to submit comments in regard to the development of the Proposition 84 IRWM guidelines. We appreciate the Department's efforts in managing the IRWM program and the guideline development process.

Sincerely,



Andy Lipkis,
President

cc: John Woodling - Chief, Conjunctive Water Management Branch, jwoodlin@water.ca.gov
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